

David P. Matthews
TX SBN: 13206200
MATTHEWS & ASSOCIATES
2905 Sackett St.
Houston, TX 77098
Tel. (713) 522-5250
Fax (713) 535-7184
matthewsivc@thematthewslawfirm.com

Richard Freese
AL Bar No. 6879-E67R
FREESE & GOSS, PLLC
1901 6th Ave N. Ste. 3120
Birmingham, AL 35203
Tel. (205) 871-4144
Fax (205) 871-4104
rich@freeseandgoss.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation

MDL No. 2:15-md-02641-PHX-DGC

**STIPULATION OF DISMISSAL
WITHOUT PREJUDICE**

This document relates to:
Aron C. Aldridge v. C.R. Bard, Inc., et al.
Member Case No. 2:16-cv-02500-DGC

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Plaintiff Aron C. Aldridge (“Plaintiff”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants
2 hereby stipulate to the dismissal of this case without prejudice to the re-filing of same. Plaintiff
3 and Defendants further stipulate that they are to bear their own costs.

4 WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants hereby respectfully
5 request that the Court dismiss this case in its entirety without prejudice to the re- filing of same
6 and order that these parties are to bear their own costs.

7 Dated this 19th day of November, 2019.

8 Respectfully submitted,

9 /s/David P. Matthews

10 David P. Matthews

MATTHEWS & ASSOCIATES

2905 Sackett St.

Houston, TX 77098

11 Richard A. Freese

FREESE & GOSS, PLLC

12 1901 6th Ave. N., Ste. 3120

Birmingham, AL 35203

13 *Attorneys for Plaintiff*

14 /s/ Richard B. North, Jr.

15 Richard B. North, Jr.

Matthew Lerner

Nelson Mullins Riley & Scarborough, LLP

16 201 17th Street, NW, Suite 1700

Atlanta, GA 30363

17 Tel. (404) 322-6000

Fax (404) 332-6397

18 *Attorneys for Defendants*

CERTIFICATE OF SERVICE

I hereby certify that, this 19th day of November, 2019, I have electronically filed a copy of the above and foregoing with Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

/s/ David P. Matthews